Cynthia Kitchens v. The Boeing Company
Case No. 2:16-cv-03723-RMG-MGB
DEFENDANT THE BOEING COMPANY'S MOTION FOR SUMMARY JUDGMENT AND SUPPORTING
MEMORANDUM

## **EXHIBIT "D"**

## EXCERPTS FROM THE DEPOSITION OF STEPHEN PARRINELLO

1	IN THE UNITED STATES DISTRICT COURT  DISTRICT OF SOUTH CAROLINA  CHARLESTON DIVISION		
3	CYNTHIA KITCHENS,		
4	Plaintiff,		•
5	vs.	CASE NO. 2:16	-cv-03723-RMG-MGB
6	THE BOEING COMPANY,		
7	Defendant.		
8			
9	DEPOSITION OF:	STEPHEN PARRINELLO	
10	DATE:	August 4, 2017	
11	TIME:	11:51 AM	
12 13	LOCATION:	Nexsen Pruet 205 King Street, Suite 400 Charleston, SC	
14	TAKEN BY:	Counsel for the Plaintiff	
15 16	REPORTED BY:	MARIE H. BRUEGGER, Registered Professional Reporter, CRR	
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21	A. WILLIAM ROBERTS, JR., & ASSOCIATES		
22	Fast, Accurate & Friendly		
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- developing and working with your peers and your personnel that work for you and making sure they understand what we're supposed to be doing, motivating them, making sure that they understand the day-to-day issues.
- Q. And not recognizing the form, but you do recognize all the comments as your comments, correct?
  - A. Yes, ma'am, uh-huh.

(Plaintiff's Exhibit 19, 2014

Performance Management Document, was marked for identification.)

BY MS. HUNT:

- Q. She's handing you what's been marked as No. 19, and it's the same form as the other one, but do you recognize any of the comments as your comments in this document also?
  - A. Yes, ma'am, they are my comments.
- Q. And if you look at Page 12, under Charts the Course, you gave her a two for opportunity for improvement?
  - A. Uh-huh.
- Q. And why did you give her a two in that area?
  - A. Because at the time we were having a

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- lot of problems with her and because when I was actually doing these, I actually asked for feedback from her customers, the production people, and they communicated to me that they were having problems with Cindy working with them, and when there was a problem, that she wouldn't try to find a way and work out with them and everything like that. Her team also had the lowest number of quality buyoffs than any other team on the site.
  - Q. And what is a quality buyoff?
- A. That is actually what a quality technician does is they actually go out, and once the production has built the airplane, quality technicians would go out and do the buyoffs for the --
- Q. And explain to me what exactly that is.
- A. So if a mechanic, say, filled this cup with water, a quality technician would make sure that the cup was filled where the engineering said it should be filled to, it wasn't too much, not enough, and then they would actually buy it off to say it met engineering intent.
- Q. And if you'll look at Page 15 of that document.

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- A. Yes, ma'am.
- Q. Under Delivers Results, you also gave her a two there. Why did you give her a two there?
- A. Again, this was because she was not following up on actions she was given, so, therefore, we didn't know -- there would be several times that I would come in in the morning, and I would have to go and do research to find out if there were things that were completed or they weren't completed.

I always -- my expectation, as I tell all my managers, is that if I give them a task, I expect feedback. Even if they can't complete it, that they would tell me: Sorry I couldn't complete this. This is why. But she would not communicate with me. She would not send me emails to say, yes, this is done, or it's not done, or it needs to be followed up on or anything like that.

And again, this partially would also be to do with her team not meeting the expectations of the rest of the teams.

Q. And in 2014, did you ever address with human resources about giving her a performance improvement plan?

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- A. Yes, I did.
- Q. And what was that?
- A. That was just prior to me finding out that I was going to final assembly, and we were advised that we shouldn't be doing that and that Ron would do that because -- or no. Sorry. Rocky would have to do that, because, obviously, he'd have to see how she performed under him.

We don't like to give a performance improvement plan that the manager -- the same manager that issues it doesn't get to follow up with it. It's not fair on the manager, and it's not fair on the employee.

- Q. And sitting here today, during that last time that you supervised Ms. Kitchens, how often would you say you met with her to discuss performance issues?
- A. I would say probably at least once a month. I mean, there would be the odd occasion where we couldn't, but it was usually monthly.
- Q. And during that year, other than the issues that you've already talked about, can you think of any of her other employees that ever made a complaint regarding her?
  - A. No, ma'am, not that I know of, no,

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Q. And did you have any issues with -- let me rephrase that.

When you were in mid body, were you the manager that ended up dealing with the Tracy Darnell issues?

- A. Yes, ma'am, I was. Myself and -because I was Cindy's manager, and Sue Heitkamp
  was Tracy's manager, who is my peer. Sue
  Heitkamp's my peer.
- Q. And what happened at the end of that process with those issues between her and Tracy?
  - A. As far as when --
  - Q. As far as you know, did they resolve?
- A. I know that when we completed with HR, we actually sat down with HR, and when we gave each one of them a verbal warning, they were -- they shook hands, they were fine, they said we'll work it out, and I never had any more issues. But I will say that I believe that Tracy Darnell was moved to a different cell at the time, very, very soon after all this happened.
- Q. Were you supervising Ms. Kitchens when she went out on medical leave?
  - A. Just the last time, just for like the

Kitchens, Cynthia v. Stephen Parrinello **Boeing Company** August 04, 2017 39 STEPHEN PARRINELLO - EX. BY MS. CHERRY 1 PIP to an employee before? 2 Α. No. 3 Q. And I want to make sure I heard, though, did you have discussions about issuing a 4 PIP to Ms. Kitchens? 5 6 Α. With Mr. Pentz? 7 Ο. No, with --Yes, with HR, yes, I did. 8 Α. 9 Q. And about you issuing a PIP to 10 Ms. Kitchens? 11 Α. Yes, ma'am, I did. 12 Q. And as I understand it, you didn't 13 when you found out --14 Α. Because we were --15 Q. -- you were moving to final assembly? 16 Α. There was a transition, so it was --17 we were advised by HR that it would not be 18 beneficial for either us or Ms. Kitchens for me to 19 do it, because I wouldn't be her direct supervisor 20 anymore. 21 And we were talking about the time Ο. 22 frame that you were her direct supervisor. 23 Α. Yes, ma'am. 24 Ο. And I just want to make sure that I've

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got it correct. And I'm going to ask you to look